

CASE MANAGEMENT TRACK DESIGNATION FORM

Keenan YOUNG	:	CIVIL ACTION
	:	
v.	:	
THE CITY OF PHILADELPHIA, et. al.	:	NO.
	:	

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (**X**)

<u>12/12/2013</u>	<u>Richard J. Fuschino, Jr.</u>	<u>Plaintiff</u>
Date	Attorney-at-law	Attorney for
<u>215-568-1442</u>	<u>215-568-1449</u>	<u>fuschino@verizon.net</u>
Telephone	FAX Number	E-Mail Address

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.Address of Plaintiff: 5201 Chancellor Street, Philadelphia, PAAddress of Defendant: 1515 Arch Street Philadelphia, PAPlace of Accident, Incident or Transaction: Philadelphia, PA

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒**RELATED CASE, IF ANY:**

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes ☐ No ☒

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes ☐ No ☒CIVIL: (Place ☒ in ONE CATEGORY ONLY)**A. Federal Question Cases:**1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts 1. ☐ Insurance Contract and Other Contracts2. ☐ FELA3. ☐ Jones Act-Personal Injury4. ☐ Antitrust5. ☐ Patent6. ☐ Labor-Management Relations7. ☒ Civil Rights8. ☐ Habeas Corpus9. ☐ Securities Act(s) Cases10. ☐ Social Security Review Cases11. ☐ All other Federal Question Cases

(Please specify) _____

B. Diversity Jurisdiction Cases:2. ☐ Airplane Personal Injury3. ☐ Assault, Defamation4. ☐ Marine Personal Injury5. ☐ Motor Vehicle Personal Injury6. ☐ Other Personal Injury (Please specify)7. ☐ Products Liability8. ☐ Products Liability — Asbestos9. ☐ All other Diversity Cases

(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Richard J. Fuschino, Jr., counsel of record do hereby certify:☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;☐ Relief other than monetary damages is sought.DATE: 12/12/2013Richard J. Fuschino, Jr.
Attorney-at-Law206094

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.**I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.**DATE: 12/12/2013Richard J. Fuschino, Jr.
Attorney-at-Law206094

Attorney I.D.#

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet.

I. (a) PLAINTIFFS

Keenan Young
5201 Chancellor St Philadelphia PA

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Richard J. Fuschino, Jr.
1600 Locust St. Philadelphia PA 19103

DEFENDANTS

City of Philadelphia
1515 Arch Street Philadelphia PA 19103

County of Residence of First Listed Defendant Philadelphia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ U.S. Government Plaintiff ☐ Federal Question (U.S. Government Not a Party)
- ☐ U.S. Government Defendant ☐ Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 10 Insurance <input type="checkbox"/> 20 Marine <input type="checkbox"/> 30 Miller Act <input type="checkbox"/> 40 Negotiable Instrument <input type="checkbox"/> 50 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 51 Medicare Act <input type="checkbox"/> 52 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 53 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 60 Stockholders' Suits <input type="checkbox"/> 90 Other Contract <input type="checkbox"/> 95 Contract Product Liability <input type="checkbox"/> 96 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 10 Land Condemnation <input type="checkbox"/> 20 Foreclosure <input type="checkbox"/> 30 Rent Lease & Ejectment <input type="checkbox"/> 40 Torts to Land <input type="checkbox"/> 45 Tort Product Liability <input type="checkbox"/> 90 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> - Employment <input type="checkbox"/> 446 Amer. w/Disabilities <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 1983 and 1988, and the Fourth, Fifth, Sixth, and Fourteenth Amendments

Brief description of cause:
False Arrest, False Imprisonment, Malicious Prosecution

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION DEMAND \$
UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

12/12/2013

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING JUDGE _____ MAG. JUDGE _____

RICHARD J. FUSCHINO, JR.
Attorney ID 206094
Counsel for Plaintiff, Keenan YOUNG
1600 Locust Street
Philadelphia, PA 19103
215-568-1442

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Keenan YOUNG,	:	CIVIL ACTION
Plaintiff	:	
	:	
	:	No: 13-CV-_____
v.	:	
	:	JURY TRIAL DEMANDED
THE CITY OF PHILADELPHIA, POLICE	:	
OFFICER AMIR WATSON, BADGE NO. 4813	:	
POLICE OFFICER GREGORY DIXON,	:	
BADGE NO. 6884 AND POLICE OFFICERS	:	
JOHN DOE NUMBERS 1 THRU 10, BADGE	:	
NUMBERS UNKNOWN,	:	
Defendants	:	

COMPLAINT

I. PRELIMINARY STATEMENT

1. This is a civil rights action filed by Keenan YOUNG pursuant to 42 U.S.C. § 1983, alleging that the plaintiff was denied the right to remain free from unwarranted search and seizure of his person and vehicle by Philadelphia Police Officers Amir Watson, badge no. 4813 and Gregory Dixon, badge no. 6884, while traveling on Greenway Avenue in Philadelphia and thereafter subjected to False Arrest and False Imprisonment in violation of the Equal Protection Clause of the United States Constitution, Fourth Amendment, the Fourteenth Amendment, and the Pennsylvania Constitution Article I, Section 1.

II. JURISDICTION

2. This action is brought pursuant to 42 U.S.C. § 1983, 1985, and 1988, 28 U.S.C. §§ 1331 and 1343(1),(3), and (4), and the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution, the Pennsylvania Constitution, and under the Common Law of the Commonwealth of Pennsylvania. Plaintiff further invokes supplemental jurisdiction of this honorable Court to hear and decide claims arising under state law.

III. PARTIES

3. Plaintiff, Keenan YOUNG (hereinafter “Plaintiff,” or “Mr. YOUNG.”) is a United States Citizen and a resident and citizen of the Commonwealth of Pennsylvania, 5021 Chancellor Street, Philadelphia, Pennsylvania.

4. Defendant, City of Philadelphia (hereinafter “the City”), is a City of the First Class in the Commonwealth of Pennsylvania and a municipal corporation duly existing and organized under the laws of Pennsylvania with offices for service at 1515 Arch Street, Philadelphia, PA 19102. At all times relevant hereto, Defendant, City of Philadelphia, operated under the color of state law in creating and maintaining a Police Department and was the employer of all of the Police Officer defendants in this action.

5. Defendant, Police Officer Amir WATSON, badge no. 4813 (hereinafter “P.O. Watson”), was at all times relevant to this Complaint an Officer of the Police Department of Defendant, City of Philadelphia, and was acting in such a capacity as the agent, servant, and/or employee of the Defendant City of Philadelphia, by and through the Police Department, acting under the direction and control of the City of

Philadelphia and its Police Department, and was acting pursuant to either official policies, statutes, ordinance, regulation, customs, practices, and usages of the City of Philadelphia and its Police Department. He is being sued in both his individual and official capacities.

6. Defendant, Police Officer Gregory DIXON, badge no. 6884 (hereinafter “P.O. Dixon”), was at all times relevant to this Complaint an Officer of the Police Department of Defendant, City of Philadelphia, and was acting in such a capacity as the agent, servant, and/or employee of the Defendant City of Philadelphia, by and through the Police Department, acting under the direction and control of the City of Philadelphia and its Police Department, and was acting pursuant to either official policies, statutes, ordinance, regulation, customs, practices, and usages of the City of Philadelphia and its Police Department. He is being sued in both his individual and official capacities.

7. Defendants John Doe Number 1 thru 10, are factitious names of individuals heretofore unascertained that were at all times relevant to this Complaint Officers of the Police Department of Defendant, City of Philadelphia, and were acting in such a capacity as the agent, servant, and/or employee of the Defendant City of Philadelphia, by and through the Police Department, acting under the direction and control of the City of Philadelphia and its Police Department, and were acting pursuant to either official policies, statutes, ordinance, regulation, customs, practices, and usages of the City of Philadelphia and its Police Department. They are being sued in both his individual and official capacities.

8. At all times material and relevant to this Complaint, Defendant, City of

Philadelphia, did act through its agents, employees, owners, representative agents, and/or employees while in the course and scope of their employment and/or agency.

9. At all times referred to herein, Defendants acted under the color of the laws, statutes, ordinances, regulations, policies, customs, and usages of the Commonwealth of Pennsylvania, the City of Philadelphia, and the Police Department of the City of Philadelphia, and pursuant to their authority as police officers of the City of Philadelphia and its Police Department.

IV. FACTS

10. On or about December 12, 2011, at approximately 10:22 p.m., Plaintiff, Keenan YOUNG, was driving in the vicinity of Greenway Avenue and 52nd Streets, in the city and county of Philadelphia when Defendants WATSON and DIXON initiated a traffic stop for an alleged “vehicle investigation.”

11. Defendants DIXON and WATSON claim that during their investigation they could smell “the odor of burned marijuana” inside the vehicle.

12. Defendants DIXON and WATSON then arrested Mr. YOUNG and transported him to the Police Detention Unit (PDU) to withdraw blood.

13. Prior to transport, Mr. YOUNG, was searched for contraband with negative results. His vehicle was searched with negative results.

14. On January 7, 2013, Mr. YOUNG's criminal matter was withdrawn. Mr. YOUNG had remained in custody for the duration.

15. Upon information and belief, Defendant DIXON was directly involved in 132 arrests in 2011, 103 of which were for Driving Under the Influence (DUI). This

represents over 77 *per cent* of Defendant DIXON's total arrests for 2011.

16. Upon information and belief, prior to partnering with Defendant DIXON, Defendant WATSON's DUI arrests comprised roughly 22 *per cent* of his total arrests. After partnering with Defendant DIXON, Defendant WATSON's DUI arrest rate rose to over 70 *per cent*.

17. A review of 40 of Defendant DIXON's DUI arrests reveal that in 39 instances, Defendant DIXON's justification for arrest was a smell of burnt marijuana, red, bloodshot, or glassy eyes, and the suspect's speech was affected.

18. Moreover, the police paperwork in these cases is often nearly identical in that it reflects the following pattern: A suspect is stopped for an alleged motor vehicle violation; the suspect is alleged to have the smell of burnt marijuana, blood shot eyes, and slurred speech; the suspect is then arrested.

19. Despite the alleged odor of burnt marijuana in the aforementioned cases, Defendants DIXON and WATSON do not recover any burnt marijuana, marijuana cigarettes, lighters, rolling papers, or see any smoke or smoking; in two cases the Defendants recover a small amount of fresh (unburned) marijuana.

20. Blood test results in those 40 cases show either no marijuana or extremely low rates of marijuana that are not consistent with use in close time to the blood draw.

21. Because blood tests are not immediately available, the suspect is charged.

22. The aforesaid assault, battery, false arrest, false imprisonment, and infliction of emotional distress of plaintiff by defendants was carried out unlawfully,

negligently, maliciously, and/or intentionally.

23. As a direct and proximate result of the negligent, intentional, unlawful, reckless, and malicious acts described above, committed by the individual Defendants, under color of law under their authority as police officers of the City of Philadelphia, and while acting in the course and scope of their employment and pursuant to authority vested in them by the Defendant, the City of Philadelphia, caused plaintiff to be falsely accused, falsely imprisoned, maliciously prosecuted, and to suffer other injuries.

24. As a further result of this incident, plaintiff has and may suffer severe actual loss of his gross income.

25. As a further result of this incident, plaintiff has and may suffer impairment of his earning capacity and power.

26. As a direct and reasonable result of this incident, plaintiff has or may hereafter incur other financial expenses and losses.

FIRST CAUSE OF ACTION

FEDERAL CIVIL RIGHTS VIOLATIONS

27. The allegations set forth in paragraphs one through 26 inclusive, are incorporated herein as if fully set forth.

28. As a direct and proximate result of all Defendants' conduct, committed under the color of state law, Defendant deprived Plaintiff of rights, privileges, and immunities under the law and the Constitution of the United States; Plaintiff's right to be free from unreasonable searches and seizures, excessive force, false arrest, false imprisonment, malicious prosecution, verbal abuse, to be secure in one's

person and property, and to due process and equal protection of law. As a result, Plaintiff suffered and continues to suffer harm in violation of Plaintiff's rights under the laws and Constitution of the United States, in particular the First, Fourth, Fifth, Sixth, and Fourteenth Amendments thereof, and 42 U.S.C. § 1983 and 1985.

29. As a direct and proximate result of the acts and omission of all Defendants, Plaintiff endured pain, suffering, emotional harm and financial losses, and was deprived of liberty and property, all to Plaintiff's detriment and loss.

30. The City of Philadelphia has encouraged, tolerated, ratified, and has been deliberately indifferent to the following patterns, practices, and customs, and to the need for more or different training, supervision, investigation in the areas of:

- a. the abuse of police powers, including but not limited to excessive force, unlawful detention, false arrest, and false imprisonment;
- b. the failure of police officers to follow established policies and procedures regarding the completion of police paperwork;
- c. the failure of the Philadelphia Police Department to maintain proper police reports, including the identity of police eyewitness information;
- d. the failure of police officer to prevent, deter, report, or to take action against the unlawful conduct of other officers under such circumstances as presented herein.

31. Defendant, the City of Philadelphia, failed to properly sanction or discipline officers who are aware and subsequently conceal and/or aid and abet violations of constitutional rights of citizens by other police officers, thereby causing

and encouraging police, including the individual Defendants, to violate the rights of citizens such as Plaintiff.

32. By these actions, all Defendants, acting in concern and conspiracy, have deprived Plaintiff of rights secured by the First, Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution, and 42 U.S.C. § 1983 and 1985.

SECOND CAUSE OF ACTION

STATE LAW CLAIMS

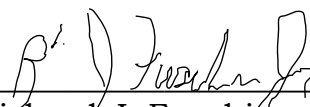
33. The allegations set forth in paragraphs one through thirty-two inclusive are incorporated herein as if fully set forth.

34. The acts and conduct of all Defendants alleged in the above cause of action constitute assault and battery, false arrest, false imprisonment, malicious prosecution, intentional infliction of emotional distress, interference with state constitutional rights, negligence, gross negligence, and negligent hiring, training, retention, and supervision under the law of the Commonwealth of Pennsylvania, and this Court has supplemental jurisdiction to hear and adjudicate those claims.

WHEREFORE, Plaintiff respectfully requests the following relief:

- a. Compensatory damages;
- b. Punitive damages;
- c. Reasonable attorney's fees and costs;
- d. Such other and further relief as appears reasonable and just;
- e. Plaintiff demands a jury trial as to each Defendant and as to each

count.



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